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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DEAN ROMERO,

Defendant.

CASE NO. 2:22-cr-00049-JAD-DJA

**DEFENDANT DEAN ROMERO'S UNOPPOSED MOTION TO CONDUCT A PRE-
PLEA PRESENTENCE INVESTIGATION REPORT AND PROPOSED ORDER**

Dean Romero, by and through his counsel, Paola M. Armeni, Esq., of the law firm of Clark Hill, PLLC, hereby moves this Honorable Court to order the United States Probation Office to prepare a limited Pre-Plea Pre-Sentence Investigation Report. The purpose of the request is so that a formal determination of Mr. Romero's criminal history score can be ascertained, as well as whether he qualifies for enhanced penalties such as career offender or armed career offender. Depending on Probation's assessment, Mr. Romero's sentencing exposure could significantly increase.

The parties have preliminarily discussed resolving this matter; however, undersigned counsel does not feel that she can effectively represent Mr. Romero and ensure his constitutional right to assistance of counsel without this information. Counsel cannot properly advise Mr. Romero on the benefits of any potential plea offer without having a full understanding of his sentencing exposure. For this reason, it is respectfully requested that the United States Probation Office be directed to prepare a limited Pre-Plea PSR as soon as practicable.

Undersigned counsel spoke to Assistant United States Attorney Kimberly Anne Sokolich on January 13, 2023, regarding this motion. She advised that she would not oppose the motion.

Dated this 13th day of January, 2023.

CLARK HILL PLLC

/s/ Paola M. Armeni

PAOLA M. ARMENI

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Attorney for Dean Romero

1 **UNITED STATES DISTRICT COURT**

2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

CASE NO. 2:22-cr-00049-JAD-DJA

4 Plaintiff,

5 vs.

6 DEAN ROMERO,

7 Defendant.

8 **ORDER**

9 IT IS HEREBY ORDERED that Defendant Dean Romero's Unopposed Motion for a Pre-
10 Plea Presentence Investigation Report is GRANTED.

11 IT IS FURTHER ORDERED that the United States Probation Office shall prepare and
12 provide to the Court by no later than February 9, 2023, a Pre-Plea Presentence
13 Investigation Report for Defendant Dean Romero's criminal history only.

14 Dated this 19th day of January, 2023.



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16 DANIEL J. ALBREGTS
17 UNITED STATES MAGISTRATE JUDGE
18 CASE NO. 2:22-cr-00049-JAD-DJA
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